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8 *Nevada Property 1 LLC*

9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 PATRICK HEEGEL,

12 Plaintiff,

13 vs.

14 NEVADA PROPERTY 1 LLC, a Delaware
limited liability company, doing business as
15 THE COSMOPOLITAN OF LAS VEGAS,

16 Defendant.

Case No.: 20-cv-00001-APG-BNW

**STIPULATION TO EXTEND TIME FOR
NEVADA PROPERTY 1 LLC'S TO FILE
A RESPONSE TO PLAINTIFF'S
COMPLAINT**

(Second Request)

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18 IT IS HEREBY STIPULATED by and between Plaintiff Patrick Heegel ("Plaintiff"),
19 through her counsel the Law Offices of Robert P. Spretnak and Defendant Nevada Property 1,
20 LLC, doing business as The Cosmopolitan of Las Vegas ("Defendant"), through its counsel
21 Jackson Lewis P.C., that Defendant shall have an extension up to and including Monday,
22 March 30, 2020 in which to file a response to Plaintiff's Complaint.

23 This is the second request for an extension of time to file a response to Plaintiff's
24 Complaint and is made in good faith and not for the purpose of delay.
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1 Nothing in this Stipulation, nor the fact of entering to the same, shall be construed as
2 waiving any claim and/or defense held by any party.

3 Dated this 16th day of March, 2020.

4 LAW OFFICE OF ROBERT P. SPRETNAK JACKSON LEWIS P.C.

5 /s/ Robert Spretnak
6 Robert Spretnak, Bar No. 5135
8275 S. Eastern Avenue, Suite 200
7 Las Vegas, Nevada 89123

8 *Attorney for Plaintiff*
9 *Patrick Heegel*

/s/ Lisa A. McClane
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Attorneys for Defendant
Nevada Property 1, LLC

10 **ORDER**

11 IT IS ORDERED that ECF
12 No. 13 is granted. The court
13 takes the parties at their
14 word, as officers of the
15 court, that the request is
16 made in good faith and not
17 for purposes of delay.
18 However, the parties are
19 advised that they must
20 provide the reasons for
21 requested extensions in the
22 future.

4825-2678-7255, v. 1

IT IS SO ORDERED:



United States District Court/Magistrate Judge

Dated: 3/17/2020